

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 1:16-03749
Reginald McKoy Robertson, Jr	:	Chapter 13
Debtor	:	
JP Morgan Chase Bank, National Association	:	
Movant	:	
vs.	:	
Reginald McKoy Robertson, Jr	:	
Debtor/Respondent	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Debtor, Reginald McKoy Robertson, Jr., by and through his attorney, James H. Turner, Esquire and Answers the Motion for Relief From Stay filed by JP MORGAN CHASE BANK, NATIONAL ASSOCIATION, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted. By further answer, debtor is aware of his delinquency to the movant and is now in a position to maintain his current mortgage payment

and would request he be able to cure the delinquency by doing a six month stipulation.

8. Admitted.

9. Admitted.

WHEREFORE, Debtor/Respondent requests this Honorable Court deny the Movant's Motion for Relief From Stay and schedule a hearing on this matter at the Court's earliest possible convenience.

Respectfully submitted,

/s/ James H. Turner

James H. Turner

Turner and O'Connell

4701 North Front Street

Harrisburg, PA 17110

pat@turnerandoconnell.com

(717) 232-4551

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In Re: : Bankruptcy No. 1:16-03749
Reginald McKoy Robertson, Jr : Chapter 13
: :
Debtor :
: :
JP Morgan Chase Bank, National Association :
: :
Movant :
: :
vs. :
: :
Reginald McKoy Robertson, Jr :
: :
Debtor/Respondent :
: :

CERTIFICATE OF SERVICE

I, James H. Turner, hereby certify that I served a true and correct copy of the foregoing by depositing a true and correct copy in the U.S. mail, first class postage prepaid, addressed, or e-mail as follows:

Charles J. DeHart III, Esquire
8125 Adams Drive
Suite A
Hummelstown, PA 17036

James C Warmbrodt, Esquire
KML Law Group PC
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106

Date: 8/21/17

/s/ James H. Turner
James H. Turner